

**From:** [Halasz, Stephen \(Austin,TX-US\)](#)  
**To:** [Gary Moore/R6/USEPA/US@EPA](#)  
**Subject:** RE: amended RAW  
**Date:** 05/09/2011 07:55 AM

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Gary,

Thanks for the note, if a tank is to remain the bottom will be thoroughly inspected. I will incorporate that into the work plan.

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**From:** Moore.Gary@epamail.epa.gov [mailto:Moore.Gary@epamail.epa.gov]  
**Sent:** Friday, May 06, 2011 10:28 AM  
**To:** Halasz, Stephen (Austin,TX-US)  
**Subject:** RE: amended RAW

Stephen:

If tanks are destined to be removed then they need to be removed and soil underneath them should be checked for visual contamination. If they are not destined to be removed then the bottoms of the tanks should be thoroughly inspected to insure that there are no cracks,holes, etc that could have resulted in contamination below them. If the inspection reveals damage to the tank bottom, then the tank bottom should be removed and any visually contaminated soil should be removed prior to repairing the tank bottom. I am assuming that the majority of the tankage is in such disrepair that they will most likely be demolished anyway. Is this clear enough?

This issue came to light during the failure of the Superior Crude tank. Superior failed to do the proper inspection of the tankage and ultimately the bottom failed which resulted in the discharge of the oil from the tank.

Thanks

Gary Moore  
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EPA Region 6  
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**From:** "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
**To:** Gary Moore/R6/USEPA/US@EPA  
**Date:** 05/05/2011 03:59 PM  
**Subject:** RE: amended RAW

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Gary,

I just saw your comment on the Work Plan. Are you saying that we need to remove all the tanks so we can see if there's contamination beneath them? As I indicated in the plan and I again witnessed this past Monday, there is



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minimal if any grossly contaminated soil so examining beneath the tanks that are to remain for grossly contaminated soil may not be necessary.

**From:** Moore.Gary@epamail.epa.gov [<mailto:Moore.Gary@epamail.epa.gov>]  
**Sent:** Thursday, May 05, 2011 3:44 PM  
**To:** Halasz, Stephen (Austin,TX-US)  
**Subject:** Re: amended RAW

Steve:

See additional comments. You have already been given the authority to begin so I hope things have already started. Additionally, you should submit a monthly report that is due by the 10th of every month resuming May 10, 2011. Please make changes. Also, what is the status of the signature page/QMP for TRC?

Gary Moore  
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From: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>  
To: Gary Moore/R6/USEPA/US@EPA  
Cc: Richard Bergner <rbergner@rflaw.net>  
Date: 05/05/2011 03:06 PM  
Subject: amended RAW

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Gary,

I made the three changes that you requested. Let me know if this works for you.

Stephen Halasz P.G.  
Program Manager



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[attachment "Removal Action work to be performed with Gary's comments.pdf" deleted by Gary Moore/R6/USEPA/US] [attachment "182978-RA-1.pdf" deleted by Gary Moore/R6/USEPA/US] [attachment "182978-RA-2.pdf" deleted by Gary Moore/R6/USEPA/US]